



AT&T

Patrick W. Turner
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AT&T Georgia
AT&T South Carolina

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June 29, 2018

The Honorable Jocelyn Boyd
Chief Clerk of the Commission
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29211

Re: AT&T South Carolina's Petition Requesting the Commission's Intervention in
Numbering Resources Determinations
Charleston Rate Center – Medical University of South Carolina ("MUSC")

Dear Ms. Boyd:

AT&T South Carolina ("AT&T") respectfully encloses for filing a Petition for Review of
Numbering Resources Determination in the Charleston rate center in the above-captioned matter.
In summary:

AT&T submitted an NXX Assignment Request via the Pooling Administration System
on June 22, 2018;

AT&T's customer requesting numbering resources is MUSC;

AT&T requested the assignment of a thousands-blocks in the Charleston center in the
format of 843-NX1, 843-NX3, 843-NX5, or 843-NX7;

The request impacts the Charleston rate center;

At the time of the filing of the numbering resource request, the Charleston Rate Center
had an MTE of 115.139 and utilization of 47.32%.

By copy of this letter, I am serving a copy of this document on all parties of record as
indicated on the attached Certificate of Service.

Sincerely,

Patrick W. Turner

PWT/sh
Enclosures

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

In Re: AT&T SOUTH CAROLINA'S)
 PETITION REQUESTING THE)
 COMMISSION'S INTERVENTION IN) Docket No. _____
 NUMBERING RESOURCES)
 DETERMINATIONS)
 _____)

PETITION FOR REVIEW OF NUMBERING RESOURCES DETERMINATION
IN THE CHARLESTON RATE CENTER

AT&T South Carolina¹, pursuant to rules adopted by the Federal Communications Commission ("FCC") for challenging numbering determinations, petitions the Public Service Commission of South Carolina ("Commission") for review of a recent denial of AT&T South Carolina's application for use of numbering resources in the 843 area code. Numbering determinations are made by the North American Numbering Plan Administrator ("NANPA") and/or the Pooling Administrator ("PA"), depending on the nature of the numbering request. The FCC's rules addressing these matters, however, generalize responsibilities of the NANPA and the PA under the heading "Central office code administration,"² and the FCC's Orders addressing these matters allow for challenges of determinations by both entities.³ Accordingly, this Petition addresses the determination described herein and asks the Commission to direct NANPA and/or the PA to provide the requested relief to the extent it is within the respective authority and responsibility of NANPA and/or the PA to do so. The denial that is the subject of

¹ BellSouth Telecommunications, LLC d/b/a AT&T South Carolina.

² See, e.g., 47 C.F.R. §52.15.

this Petition impacts AT&T South Carolina's customer, The Medical University of South Carolina.

In support of this Petition, AT&T South Carolina states:

1. AT&T South Carolina is a telephone utility that provides, among other things, intraLATA, local exchange telecommunications services in various portions of South Carolina, including the Columbia exchange.

2. NANPA is an independent non-governmental entity that is responsible for administering and managing the North American Numbering Plan ("NANP").⁴

3. The PA is an independent non-governmental entity that is responsible for administering thousands-block number pooling.⁵

4. On March 31, 2000, the FCC issued an Order relating to numbering resource optimization.⁶ The goal of the *First NRO Order* was to implement uniform standards governing requests for telephone numbering resources in order to increase efficiency in the use of existing telephone numbers and to avoid further exhaustion of existing numbers.

5. Among other things, the FCC required that, to qualify for access to new numbering resources, applicants must establish that existing inventory within the applicant's rate center will be exhausted within six months of the application. The FCC reaffirmed this

³ See Third Report and Order and Second Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, *Numbering Resource Optimization; etc.*, 17 FCC Rcd 252, ¶61 (2001) ("*Third NRO Order*").

⁴ See 47 C.F.R. § 52.13 (a), (b).

⁵ See 47 C.F.R. §52.7(g). See also 47 C.F.R. §52.20 ("Thousands-block number pooling is the process by which the 10,000 numbers in a central office code (NXX) are separated into ten sequential blocks of 1,000 numbers each (thousands-blocks), and allocated separately within a rate center.").

requirement in two subsequent orders.⁷ Prior to this ruling, the Central Office Code Assignment Guidelines used to make code assignments required the applicant's existing number inventory within the applicant's serving switch to exhaust within six months of the code application or the carrier had to prove that it was unable to meet a specific customer's request with its current inventory of numbers in order for a code to be assigned.

6. In addition to the months-to-exhaust ("MTE") requirement described above, the FCC's rules also required carriers to meet a rate center utilization threshold of 60 percent in order to receive additional numbering resources in a given rate center.⁸ The utilization threshold has increased by five percent per year, and it has now reached the maximum of 75 percent. Based on the FCC's orders, carriers must meet both the six months MTE requirement and the utilization threshold on a rate center basis in order to obtain numbering resources.⁹

7. On or about June 22, 2018, AT&T South Carolina submitted a Pooling Administration System request for the assignment of a thousands-blocks in the Charleston rate center to integrate into its customer's existing dialing plan. In order to meet the customer's express request for numbers,¹⁰ AT&T South Carolina requested the assignment of one thousands-blocks in the Charleston rate center.¹¹ AT&T South Carolina does not have the

⁶ See Report and Order and Further Notice of Proposed Rule Making, *Numbering Resources Optimization*, 15 FCC Rcd 7574 (2000) ("*First NRO Order*").

⁷ See Second Report and Order, Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, and Second Further Notice of Proposed Rulemaking in CC Docket No. 99-200, *Numbering Resource Optimization*, 16 FCC Rcd 306 at ¶29 (2000) ("*Second NRO Order*"); *Third NRO Order* at ¶¶48-49.

⁸ See *Second NRO Order* at ¶22; *Third NRO Order* at ¶¶50-52.

⁹ *Third NRO Order* at ¶¶50-52.

¹⁰ See Exhibit A to this Petition. Specifically, the customer requested one of the following thousands blocks: 843-NX1, 843-NX3, 843-NX5, or 843-NX7.

¹¹ See Exhibit B to this Petition.

existing numbers to meet the customer's request and, therefore, is requesting that a new code be opened and these numbers be assigned to it.

8. AT&T South Carolina's application was completed in accordance with Industry Numbering Committee ("INC") guidelines, and AT&T South Carolina filled out the necessary MTE Certification Worksheets as required.

9. At the time of the filing of the numbering resource request, the Charleston rate center had an MTE of 115.139 months and a utilization of 47.32%.¹²

10. Thereafter, also on June 22, 2018, AT&T South Carolina's request was denied because AT&T South Carolina had not met the MTE criterion now set forth in the INC Guidelines.¹³ AT&T South Carolina's numbering resource requests were denied despite the fact that AT&T South Carolina does not have adequate numbering resources needed to satisfy this customer's demands in the Columbia Rate Center.

11. AT&T South Carolina's inability to provide this important customer with the requested numbering resources prevents AT&T South Carolina from providing the quality of service this customer desires, needs, and expects. If AT&T South Carolina is not assigned the numbering resources needed to meet the customer's request, AT&T South Carolina will be unable to provide telecommunications services requested by its customer. The refusal to grant numbering resources sufficient to meet the needs of this customer is inconsistent with the FCC's position that "(u)nder no circumstances should consumers be precluded from receiving

¹² See *Id.*

¹³ See *Id.*

telecommunications services of their choice from providers of their choice for want of numbering resources.”¹⁴

12. Both the FCC’s rules and the INC Guidelines provide that state regulatory authorities have the power and authority to review a decision to deny a request for numbering resources.¹⁵

13. Prior to the FCC’s Order and the resulting change in the INC Guidelines, the applicable MTE procedures permitted a carrier to receive a code assignment, even if the MTE requirement at the switch level was not met. These waivers or exceptions were granted where customer hardships could be demonstrated or where the service provider’s inventory did not have a block of sequential numbers large enough to meet the customer’s specific request. Under today’s procedures, numbering determinations are based on the MTE for the entire rate center without any exceptions. The FCC has determined, however, that States may grant relief “if a carrier demonstrates that it has received a customer request for numbering resources in a given rate center that it cannot meet with its current inventory.”¹⁶ In addition, the FCC has ruled that, “States...may grant requests for customers seeking contiguous block of numbers.”¹⁷

¹⁴ *Second NRO Order* at ¶ 61.

¹⁵ *See Third NRO Order*, Appendix A, Final Rules, § 52.15(g) (4) (“The carrier may challenge the NANPA’s decision to the appropriate state regulatory commission”); *Third NRO Order* at ¶¶ 61-66; *Central Office Code (NXX) Assignment Guidelines*, INC 95-407-009, § 13.0 (rev. April 26, 1999)(CO Code Guidelines) (“Appeals may include but are not limited to one or more of the following options: . . . C. The CO Code Administrator(s) and code holders/applicants may pursue the disagreement with the appropriate governmental/regulatory body”).

¹⁶ *Third NRO Order* at ¶ 64.

¹⁷ *Id.*

14. AT&T South Carolina requests that the Commission reverse the decision to withhold numbering resources from it because that decision interferes with AT&T South Carolina's ability to provide telecommunication services to its customers.

15. This Commission (see Docket No. 2002 -185-C, Order No. 2002-415) and other state regulatory agencies in Alabama, Florida, Georgia, Louisiana, North Carolina, and Tennessee similarly have recognized their jurisdiction and authority to review numbering denials and to order the release of number resources to AT&T South Carolina to meet customer needs.

WHEREFORE, AT&T South Carolina requests that the Commission:

- A. Reverse the decision to deny AT&T South Carolina's request for additional numbering resources;
- B. Direct NANPA and/or the PA (to the extent it is within the respective authority and responsibility of NANPA and/or the PA to do so) to provide a thousand block in the Charleston rate center (preferably, and per the customer's request, one of the following: 843-NX1, 843-NX3, 843-NX5, or 843-NX7); and
- C. Grant the requested relief as soon as possible.

Respectfully submitted this 29th day of June 2018.



Patrick W. Turner
675 W. Peachtree St., NE
Room 4323
Atlanta, Georgia 30308

ATTORNEY FOR AT&T SOUTH CAROLINA

EXHIBIT A



MUSC Information Solutions
Harborview Office Tower
Suite 201
19 Hagood Avenue
PO Box 250801
Charleston, SC 29425
Tel 843 792-4175
Fax 843 792-8139
www.musc.edu/ocio

To: AT&T

From: Michael Caputo, Chief Information Officer

MUSC is close to exhausting its current 20,000 DID numbers in the 843-792-xxxx and 843-876-xxxx blocks. Multiple new hospital expansion projects are requiring that we add to our existing dial plan by requesting additional numbers. An NXX block of 10,000 numbers will not only allow MUSC to grow its voice platform for the immediate need, but also better position it for future voice deployment. To avoid confusion and dial plan number collision we are requesting that the NPA be 843 and that the third digit of the NXX be 1, 3, 5, or 7.

Thank you-

Michael P. Caputo

Chief Information Officer

MUSC Information Solutions

EXHIBIT B

Central Office Code Assignment Guidelines (COCAG)
Central Office Code (NXX) Assignment Request-Part 1

Revised: January 4, 2016

Tracking Number: 843-CHARLESTON-SC-1100217
Full NXX: Dedicated Customer

Type of Application: ☒ New ☐ Change ☐ Delete

1.0 GENERAL INFORMATION

1.1 Contact Information:

Code Applicant:

Company/Entity Name: BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL

Headquarters Address: 5001 EXECUTIVE PARKWAY 3W200L

City, State, Zip: San Ramon, CA, 94583

Contact Name: Rowena Brown

Contact Address: 5001 EXECUTIVE PARKWAY 3W200L

City: San Ramon

State: CA ZIP: 94583

Phone: 925-543-1526

Fax : 925-355-9268

E-mail: rb2548@att.com

Code Administrator:²

Name: Patricia Soderland

Address: 21575 Ridgeway Circle

City: Sterling

State: VA ZIP: 20166

Phone: 571-434-5348

Fax : 571-434-5502

1.2 NPA: 843 NXX:³ OCN(s) 9400 LATA: 436 OCN:⁴ 9417 Parent Company's

Switching Identification (Switching Entity/POI) ⁵CHTNSCDT72E

Locality/City/Wire Center:

Rate Center:⁶CHARLESTON

Homing Tandem Operating Co. ⁷BELLSOUTH TELECOMM INC

Tandem Homing CLLI^{TM8}:CHTNSCDT60T

1.3 Dates

Date of Application:06/22/2018

Requested Effective Date:^{9,10}
08/27/2018

☐ By selecting this checkbox, I acknowledge that I am requesting the earliest possible effective date the Administrator can grant. Please note that this only applies to a reduction in the Administrator's processing time, however the request will still be processed in the order received.

Request Expedited Treatment Yes ☐ No ☒

Expedite Documentation must be provided if "Request Expedite" = Yes

Expedited Explanation:

1.4 a) Type of Company/Entity Requesting Code (LEC, IC, CMRS, Other): Incumbent Local Exchange Carrier (ILEC)

b) Type of service (e.g., Cellular - Type 2): Wireline

c) Code Assignment Preference (Optional) _____

d) Codes that are undesirable, if any _____

e) Type of Change (Mark all that apply)

☐ OCN-Intra-company¹¹ ☐ Switching Id ☐ Rate Center ☐ Tandem Homing CLLI

☐ OCN-Inter-company¹² ☐ Effective Date ☐ LATA ☐ Extend Reservations

1.5 Type of Request (Initial, growth, etc.) Growth

If an initial code, attach (1) evidence of certification and (2) proof of ability to place code in service within 60 days. If a growth code, attach months to exhaust worksheet.

Pooling Indicator: ¹³ ☒ Yes ☐ No

1.6 NPA Jeopardy Criteria Apply: ☐ Yes ☒ No

1.7 Code request for new service (Explain): Full code request for a dedicated customer: MEDICAL UNIVERSITY OF SOUTH CAROLINA

1.8 It is the code applicant's responsibility to arrange input of Part 2 information into BIRDS. The 45-calendar day nationwide minimum interval cut-over for BIRDS will not begin until input into BIRDS has been completed.

Comments:

I hereby certify that the above information requesting an NXX code is true and accurate to the best of my knowledge and that this application has been prepared in accordance with Central Office Code (NXX) Assignment Guidelines posted to the ATIS web site (<http://www.atis.org/inc/incguides.asp>) as of the date of this application¹⁴.

Rowena Brown
Signature of Code Applicant

Senior Network Specialist
Title

06/22/2018
Date

¹Identify type and reason for change(s) in Section 1.4(e).

²A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from NANPA.

³The NXX field is required for any code request in which there is a change or the NXX is being returned.

⁴Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments may contact NECA (800-228-8597) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignment should direct questions regarding appropriate OCN usage to the iconectiv Telcordia™ Routing Administration (TRA) on 732-699-6700.

⁵This is an 11 character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character Common Language® Location Code (CLLI™ Code) of the applicant's switch or POI. Common Language® and Telcordia® are registered trademarks and CLLI™, LERG™ Routing Guide and iconectiv™ are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

⁶Rate Center name must be a tariffed Rate Center associated with toll billing.

⁷Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a different carrier.

⁸This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI™ Location Identification Code of the switching entity/POI, and is the same on Part 2, Form 1, Page 2 of 2.

⁹Code applicants should request an effective date that is at least 66 calendar days from the submission of this form. It should be noted that interconnection arrangements and facilities need to be in place prior to activation of a code. Such arrangements are outside the scope of these guidelines.

¹⁰Requests for code assignment shall not be made more than six months prior to the requested effective date.

¹¹Select if you are the current Code Holder

¹²Select if you are not the current Code Holder

¹³The Applicant will indicate "YES" if the NXX being requested will be used for thousands-block number pooling and will leave this field blank if it is not.

¹⁴An incomplete form may result in delays in processing this request.

Thousands-Block Number Pooling Administration Guidelines (TBPAG) - Appendix 3

Revised: January 4, 2016

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level¹

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: **843-CHARLESTON-SC-1100217**

Date: **Friday, June 22, 2018** OCN:**9417** Company Name: **BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL**

Rate Center: **CHARLESTON**

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s)²:
843 202 1 843 202 2 843 202 3 843 202 6 843 202 7 843 202 8 843 207 0 843 207 1 843 207 3 843 207 5 843 207 6 843 207 7 843 207 8 843 207 9 843 323 3 843 402 0 843 402 1 843 402 2 843 402 3 843 402 4 843 402 5 843 402 6 843 402 7 843 402 8 843 402 9 843 406 0 843 406 1 843 406 2 843 406 4 843 406 6 843 406 7 843 406 8 843 406 9 843 518 4 843 534 0 843 534 1 843 534 2 843 534 4 843 557 0 843 557 1 843 566 0 843 566 1 843 566 7 843 566 8 843 566 9 843 573 0 843 573 1 843 573 2 843 573 3 843 573 4 843 573 5 843 573 6 843 573 8 843 573 9 843 574 0 843 574 1 843 574 2 843 574 3 843 574 5 843 574 6 843 574 7 843 574 9 843 641 1 843 641 2 843 641 3 843 641 4 843 641 5 843 641 6 843 724 0 843 724 1 843 724 2 843 724 3 843 724 4 843 724 5 843 724 6 843 724 7 843 724 8 843 727 0 843 727 1 843 727 2 843 727 3 843 727 4 843 727 6 843 727 7 843 727 8 843 743 0 843 743 2 843 743 7 843 764 0 843 764 1 843 764 2 843 764 3 843 764 4 843 764 5 843 764 6 843 764 8 843 789 1 843 789 2 843 789 5 843 789 6 843 789 7 843 789 8 843 794 0 843 794 1 843 794 2 843 794 3 843 794 4 843 794 5 843 794 6 843 794 7 843 794 8 843 794 9 843 805 0 843 805 1 843 805 2 843 805 3 843 805 5 843 805 6 843 805 7 843 805 8 843 805 9 843 818 0 843 818 1 843 818 2 843 818 5 843 818 6 843 818 7 843 824 0 843 824 1 843 824 2 843 824 3 843 824 5 843 824 6 843 824 7 843 824 8 843 824 9 843 847 2 843 847 3 843 847 4 843 847 5 843 864 2 843 952 0 843 952 1 843 973 1 843 973 3 843 973 4 843 973 5 843 973 6 843 973 7 843 973 9 843 974 0 843 974 1 843 974 2 843 974 3 843 974 6 843 974 8 843 974 9 843 218 843 243 843 308 843 404 843 529 843 552 843 553 843 554 843 556 843 559 843 569 843 571 843 572 843 577 843 579 843 720 843 721 843 722 843 723 843 740 843 744 843 745 843 746 843 747 843 760 843 762 843 763 843 766 843 767 843 768 843 769 843 792 843 795 843 797 843 820 843 852 843 853 843 863 843 876 843 937 843 953 843 963 843 965

Name of Block Applicant: **Rowena Brown** Signature: **Rowena Brown**

Title: **Senior Network Specialist** Phone: **925-543-1526-** Fax: **925-355-9268**

E-Mail: **rb2548@att.com**

- A. Available Numbers: **191898**
- B. Assigned Numbers: **192497**
- C. Total Numbering Resources: **406795**

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation ³: **0**

List Excluded Code(s) or Block(s):

	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6	Month 7	Month 8	Month 9	Month 10	Month 11	Month 12
E. Growth History - Previous 6 months ⁴	-1388	38	548	-146	-155	281						

From: john.auerbach@neustar.biz
Sent: Friday, June 22, 2018 1:25 PM
To: CODE ADMINISTRATION CA; BROWN, ROWENA R
Cc: PA_Part3@neustar.biz
Subject: , 843-CHARLESTON-SC-1100217 - DENIED PAS - Part 3 Confirmation

Pooling Administration System

Dated 22 June 2018

Thousands-Block Number Pooling Administration Guidelines (TBPAG) - Part 3

Revised: January 4, 2016

Pooling Administrator's Response/Confirmation

Tracking Number : 843-CHARLESTON-SC-1100217

Date of Application: 06/22/2018 Effective Date: _____
 Date of Receipt: 06/22/2018 Date of Response: 06/22/2018

Service Provider Name: BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL
 (LERG™ Routing Guide¹)
 OCN: 9417
 Parent Company OCN: 9400

NPAC SOA SPID : _____

Pooling Administrator Contact Information:
John Auerbach Phone: 925-363-8706
 Signature of Pooling Administrator
John Auerbach Fax: 925-363-7684
 Name (print)
 Email: john.auerbach@neustar.biz

NPA-NXX or NPA-NXX-X : _____ Block Assigned: _____
 Block Reserved : _____

Block Reservation

Expiration Date : _____

Block/Code Modified : _____

Block/Code

Disconnected : _____

Block Contaminated (Yes or No): _____

If yes, enter the number of TNs contaminated (1-1000): _____

Switch Identification (Switching/POI)²: _____

CHTNSCDT72E

Rate Center: _____

CHARLESTON

☒ Form complete, request denied.

Explanation:

DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new code is denied. You may proceed with requesting a State Waiver from the appropriate state commission using this Part 3 denial. If you are in disagreement with the disposition of this request, please refer to the Thousands-Block Number (NXX-X) Pooling Administration Guidelines for the appeals process.

☐ Request Withdrawn.

Explanation: _____

☐ Assignment Activity Suspended by Administrator.

Explanation: _____

Remarks: _____

¹ Telcordia* is a registered trademark and LERG™ Routing Guide and iconectiv™ are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

² This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the Common Language* Location Code (CLLI™ Code) of the switching entity/POI shown on the Part 1A form. Common Language* is a registered trademark and CLLI is a trademark and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND) **CERTIFICATE OF SERVICE**

The undersigned, Susan Hodge, hereby certifies that she is employed by the Legal Department for AT&T South Carolina and that she has caused AT&T South Carolina's Petition for Review of Numbering Resources Determination in the Charleston Rate Center to be served by the method indicated below upon the following this 29th day of June, 2018:

Thomas C. Foley
Sr. NPA Relief Planner – Eastern Region NANPA
NeuStar – NANPA
820 Riverbend Blvd.
Longwood, FL 32779-2327
(Via Email thomas.foley@neustar.biz)

Ms. Kimberly Miller
Regulatory Policy Attorney
NeuStar-NANPA
2000 M Street, NW, Suite 600
Washington, DC 20036-3328
(Via Email Kimberly.miller@neustar.biz)

Wayne Milby
Sr. NPA Relief Planner
NueStar-NANPA
8385 Yahley Mill Rd.
Richmond, VA 23231
(Via Email wayne.milby@neustar.biz)

Mr. John Manning
Director
NANPA Regional Offices
46000 Center Oak Plaza
Sterling, VA 20166
(Via Email john.manning@neustar.biz)

John Auerbach
Director-Neustar National Pooling Administrator
1800 Sutter Street
Suite 780
Concord, CA 94520
(Via Email john.auerbach@neustar.biz)

Linda Hymans
Sr. Mgr. Regulatory Compliance – Neustar Pooling Admin.
1800 Sutter Street
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Concord, CA 94520
(Via Email linda.hymans@neustar.biz)

F. David Butler, Esquire
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(Via Email david.butler@psc.sc.gov)

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Susan Hodge

1165851